

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:

ATLAS ACQUISITIONS LLC, *et al*

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MISC CASE NO. 16-302
(JUDGE ISGUR)

NOTICE OF DEFICIENT APRIL 21ST DOCUMENT PRODUCTION OF JOEL TUCKER
(Relates to Dkt ## 35, 40, 58 & 60)

**TO THE HONORABLE MARVIN ISGUR,
UNITED STATES BANKRUPTCY JUDGE:**

1. On April 4, 2016, this Court approved an Order of Temporary Release (“the April 4th Order”), which conditioned Joel Tucker’s release from jail on, among other things, Mr. Tucker’s production of documents on a rolling basis.

2. The first deadline for Mr. Tucker to produce documents under the April 4th Order was 4 p.m. on Friday, April 8, 2016. By that time, the Order commanded Mr. Tucker to produce “copies of all emails, e-mail attachments, text messages and other electronic communications directly or indirectly related to the \$390.00 alleged ‘Castle Peak’ claims” (“the April 8th production”).

3. The deficient nature of Mr. Tucker’s April 8th production is described in the Notice of Deficient April 8th Document Production of Joel Tucker (Dkt #40).

4. The second deadline for Mr. Tucker to produce documents under the Court’s April 4th Order was 4 p.m. on Friday, April 15, 2016. By that time, the Order commanded Mr. Tucker to produce “copies of all electronic and paper records located in Colorado and directly or indirectly related to the \$390.00 alleged ‘Castle Peak’ claims” (“the April 15th production”).

5. The deficient nature of Mr. Tucker's April 15th production is described in the Notice of Deficient April 15th Document Production of Joel Tucker (Dkt #58).

6. The third deadline for Mr. Tucker to produce documents under the Court's April 4th Order was 4 p.m. on Thursday, April 21, 2016. By that time, the Order commanded Mr. Tucker to produce "copies of all electronic and paper records located in any location other than in Kansas or Colorado and directly or indirectly related to the \$390.00 alleged 'Castle Peak' claims" ("the April 21st production").

7. As with first two productions, Mr. Tucker's April 21st production was seriously deficient. The entire production constituted of a one-page document listing information pertaining to 26 borrowers of \$390 loans, a spreadsheet showing some contact information of approximately 35 apparent issuers of payday loans, and a third document that appears to be photographs of seven email addresses and two phone numbers of unidentified persons and/or entities.

8. Although three document production deadlines have passed, Mr. Tucker still has not provided any of the following documents:

- Copies of emails and related documents relating to Mr. Tucker's extensive email communications with Jeffrey Brooks of First Source Data, LLC regarding the negotiation and sale of the \$390 claims to Porania, LLC; and
- Copies of any emails, attachments, documents and other electronic communications between Mr. Tucker and the persons or entities who own the \$390 claims or from whom he acquired the \$390 claims.

Respectfully submitted:

/s/ Tom Kirkendall

Tom Kirkendall

State Bar No. 11517300/SDTX No. 02287

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CERTIFICATE OF SERVICE

The undersigned certifies that, on April 22nd, 2016, a true and correct copy of the foregoing notice was served upon the following parties-in-interest via email and through the ECF system:

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